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December 24, 2024

Via ECF

The Honorable Joseph F. Leeson, Jr.
United States District Court
Eastern District of Pennsylvania
504 W. Hamilton Street
Suite 3401
Allentown, PA 18101

Re: *Smith v. The Fintex Group, LLC et al.*
5:24-cv-02134-JFL

Dear Judge Leeson:

I write on behalf of Defendants in compliance with Your Honor's Dec. 17 Order.¹ Enclosed with this letter is a proposed Order that would compel Plaintiff to produce two classes of documents:

- (1) Plaintiff's non-privileged communications with individuals, including Defendants, that Plaintiff has identified² as having (or potentially having) knowledge or information relative to the allegations in this case;³ and
- (2) Plaintiff's consulting business's client contracts.⁴

The proposed Order would also deny Plaintiff's requested relief.

Thank you, Judge Leeson, for considering Defendants' proposed Order.

¹ Doc. 42.

² See Defs.' First Set of Interrogs. at No. 1 ("Identify every person whom you know or believe to have personal knowledge of any of the facts alleged in the Complaint[.]");

³ See Defs.' First Doc. Req. at No. 22 ("[C]ommunications between and or among you and each person you believe has knowledge or information relating to the facts of your case or the allegations in your complaint[.]"); *Id.* at No. 26 ("Communications which refer or relate to and/or otherwise mention: (a) Defendants; (b) Your alleged employment with Defendants; or (c) this . . . lawsuit.").

⁴ See Defs.' Second Doc. Req. at No. 1 ("Please produce all contracts between The Linchpin Company, LLC and its client(s) from 2015 through the present.").

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Season's greetings,

/s/ Erik R. Anderson

Erik Roberts Anderson

MCNEES WALLACE & NURICK LLC

cc: All Counsel of Record (via ECF)

Encl.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER SMITH,

Plaintiff/Counterclaim Defendant

v.

THE FINTEX GROUP LLC and
ANDREW WEINSTEIN,

Defendants/Counterclaim Plaintiffs

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No. 5:24-cv-02134-JFL

JURY TRIAL DEMANDED

ORDER

AND NOW this ____ day of _____, 202__, upon consideration of Defendants' Dec. 24, 2024 letter (Doc. 48), it is **ORDERED** and **DECREED** that within 14 days of this Order:

- (1) Plaintiff shall make a rule-compliant and complete document production—excluding documents Plaintiff has already produced—to Defendants as follows:
 - (a) Plaintiff's non-privileged communications with each individual identified in Plaintiff's Dec. 10, 2024 Amended Response to Defendants' First Set of Interrogatories in response to Defendants' Interrogatory Request No. 1;
 - (b) All contracts between The Linchpin Company, LLC and its client(s) from 2015 through the present.

It is further **ORDERED** and **DECREED** that the relief sought by Plaintiff in Doc. 44 is **DENIED**.

BY THE COURT:

JOSEPH F. LEESON, JR.
United States District Judge